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The Trusted Integrator for Sustainable Solutions

REMOVAL SUPPORT TEAM 3
EPA CONTRACT EP-S2-14-01

November 3, 2014

Mr. Angel Rodriguez, On-Scene Coordinator
U.S. Environmental Protection Agency
Response and Prevention Branch
Caribbean Environmental Protection Division, Region II
1492 Peñuelas De Leon Ave., Suite 417
San Juan, PR 00907-4127

EPA CONTRACT No.: EP-S2-14-01

TDD No.: TO-0001-0005

DOCUMENT CONTROL No.: RST3-01-F-0045

**SUBJECT: FINAL PHASE 1 REMOVAL ASSESSMENT SAMPLING TRIP REPORT,
REVISION 2 – PUERTO RICO OLEFINS ASBESTOS SITE, PEÑUELAS,
PUERTO RICO**

Dear Mr. Rodriguez,

Enclosed please find the Final Phase 1 Removal Assessment Sampling Trip Report, Revision 2 for the sampling activities conducted on November 21, 2013 and December 13, 2013 at the Puerto Rico Olefins Asbestos Site located in Peñuelas, Puerto Rico. The U.S. Environmental Protection Agency comments regarding the draft versions of this deliverable have been incorporated. If you have any questions or comments, please do not hesitate to contact me at (787) 354-2489.

Sincerely,

Weston Solutions, Inc.

for Carlos Huertas
RST 3 Site Project Manager

Enclosure

cc: TDD File No.: TO-0001-0005

an employee-owned company

In association with Scientific and Environmental Associates, Inc.,
Environmental Compliance Consultants, Inc., Avatar Environmental, LLC,
On-Site Environmental, Inc., and Sovereign Consulting, Inc.



**FINAL PHASE 1 REMOVAL ASSESSMENT
SAMPLING TRIP REPORT, REVISION 2
PUERTO RICO OLEFINS ASBESTOS SITE
PEÑUELAS, PUERTO RICO**

Prepared for:

U.S. Environmental Protection Agency
Region II – Response and Prevention Branch
Edison, New Jersey 08837

Prepared by:

Removal Support Team 3
Weston Solutions, Inc.
East Division
Edison, New Jersey 08837

DC No.: RST3-01-F-0045
TDD No.: TO-0001-0005
EPA Contract No.: EP-S2-14-01

November 2014

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FINAL PHASE 1 REMOVAL ASSESSMENT
SAMPLING TRIP REPORT, REVISION 2

SITE NAME: Puerto Rico Olefins Asbestos Site
DC No.: RST 2-02-F-2637
TDD No.: TO-0029-0122
SAMPLING DATES: November 21, 2013 and December 13, 2013

1. Site Location: Peñuelas, Puerto Rico (N18°08'91" W66°43'24.57")
Refer to Attachment A, Figure 1: Site Location Map.

2. Sample Descriptions: Seven bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Refer to Attachment A, Figure 2: Sample Location Map and Attachment B, Table 1: Sample Collection Information Table.

3. Laboratory Receiving Samples:

Lab Name/Location	Sample Type	Parameters
EMSL Analytical, Inc. 200 Route 130 North Cinnaminson, NJ 08077	Bulk, Soil, and Wipe	Asbestos

4. Sample Dispatch Data:

On November 22, 2013, the first attempt to ship the samples collected from the Puerto Rico Olefins Asbestos Site (the Site) were mistakenly rejected by FedEx due to a misinterpretation of the dangerous goods shipping regulations. On November 25, 2013, Weston Solutions Inc., Removal Support Team 2 (RST 2) [currently the Removal Support Team 3 (RST 3)] shipped five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank, to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under Chain of Custody (COC) No. 00290122-112213-001 and FedEx Airbill No. 871377790608. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.

On December 16, 2013, RST 2 shipped two additional bulk samples to the EMSL Analytical, Inc. laboratory located in Cinnaminson, New Jersey for asbestos analysis under COC No. 2-121613-123844-0010 and FedEx Airbill No. 873699443231. Refer to Attachment C: Chain of Custody Records and FedEx Airbills.

5. Personnel On Site:

<u>Name</u>	<u>Representing</u>	<u>Duties On-Site</u>
Angel Rodriguez	U.S. EPA, Region II	On-Scene Coordinator
Carlos Rivera	U.S. EPA, Region II	Air Program Support
Carlos Huertas	RST 2, Region II	Site Project Manager, Field Coordinator, Site QA/QC, Site Health and Safety, Sample Collection and Sample Management
Emilio Betancourt	RST 2, Region II	Sample Collection and Sample Management

6. Site Background:

The Site is located at Road 385, KM 5.4, Tallaboa, Poniente Peñuelas, Puerto Rico. During a visual inspection, the U.S. Environmental Protection Agency (EPA) identified fugitive dust clouds migrating out of the facility during demolition activities conducted by HOMECA Inc. Beginning in 2010 and continuing until the present, an asbestos abatement occurred at the Site. Improper asbestos abatement techniques may have been used at the Site resulting in potential asbestos contamination throughout the Site and in residential neighborhoods downwind of the Site. RST 2 was tasked with conducting multi-media sampling for asbestos at the Site and also at one residential property, one commercial property, and one school downwind of the Site.

7. Removal Assessment Summary:

On November 21, 2013, the EPA On-Scene Coordinator (OSC), and EPA Air Program representative, and RST 2 mobilized to the Site to perform multi-media sampling. As directed by the EPA OSC, RST 2 collected five bulk samples, including one field duplicate, four soil samples, including one field duplicate, and 10 wipe samples, including one wipe blank. Bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using Polarized Light Microscopy (PLM). Soil samples were collected and submitted for asbestos analysis via modified EPA 600/R-93/116 Method using Transmission Electron Microscopy (TEM) with California Air Resource Board (CARB) 435 prep. Wipe samples were collected and submitted for asbestos analysis via American Society for Testing Materials (ASTM) 6480-05 Method. Samples were collected from outside areas where suspected asbestos contamination may have occurred and inside areas where asbestos may have entered the building.

On December 13, 2013, the EPA OSC and RST 2 remobilized to the Site to collect two additional bulk samples. The additional bulk samples were collected from two specific locations as directed by the EPA OSC. The two bulk samples were collected and submitted for asbestos analysis via EPA 600/R-93/116 Method using PLM. Samples were collected from outside areas where suspected asbestos contamination may have occurred. Refer to Attachment A, Figure 2: Sample Location Map for the depiction of where each of the samples were collected from. Refer to Attachment B, Table 1: Sample Collection Information Table for details regarding the locations of each sample collected. Refer to

Attachment D for the Photographic Documentation Log, Revision 1 for the Removal Assessment sampling event.

Bulk Sampling:

Bulk presumably asbestos-containing material (PACM) samples were collected from areas on the Site as directed by the EPA OSC. All bulk PACM samples were suspected to have been from insulation that was used at the Site that was left on the ground post-abatement activities. All PACM identified on the Site was suspected to be friable and had the potential of migrating off site. Bulk PACM samples were collected and immediately placed inside two zip-lock bags in order to contain any asbestos fibers inside the bags. Samples were collected utilizing EPA's Environmental Response Team (ERT) Standard Operating Procedure (SOP) No. 2001, General Field Sampling Guidelines.

Soil Sampling:

Three soil sample locations were chosen by the EPA OSC at the Site. Soil samples were collected from the surface at a depth of 0 to 6 inches using polyvinyl chloride plastic scoops. Samples were collected utilizing EPA's ERT SOP Nos. 2001, General Field Sampling Guidelines, and 2012, Soil Sampling.

Wipe Sampling:

Surface dust samples were collected from areas where suspected asbestos contamination may have occurred, such as outdoor areas and nearby open windows inside of buildings, utilizing dedicated Ghost Wipes™. Samples were collected following the general guidance within the HUD Guidelines, Chapter 5: Risk Assessment. Each sample was collected from a 10 cm by 10 cm square (100 cm²) area utilizing EPA ERT SOP Nos. 2001, General Field Sampling Guidelines, and 2011, Chip, Wipe, and Sweep Sampling, as well as NIOSH Method 9100, as guidance.

8. Analytical Discussion:

Based on the validated analytical results, asbestos was detected in bulk PACM samples ranging from non-detect to 40 percent (%) amosite and 20% chrysotile, in soil samples ranging from 3 amosite/chrysotile asbestos structures to 9 amosite/chrysotile asbestos structures, and in wipe samples ranging from 7,760 structures per square centimeter (str/cm²) to 374,000 str/cm². The two additional bulk samples collected on December 13, 2013 were both non-detect for asbestos. The wipe blank sample was non-detect for asbestos. Refer to Attachment B, Table 2: Validated Analytical Data Summary – Asbestos Bulk Samples, Table 3: Validated Analytical Data Summary – Asbestos Soil Samples, and Table 4: Validated Analytical Data Summary – Asbestos Wipe Samples.

Report prepared by: 

Date: 11/3/14

for Carlos Huertas
RST 3 Site Project Manager

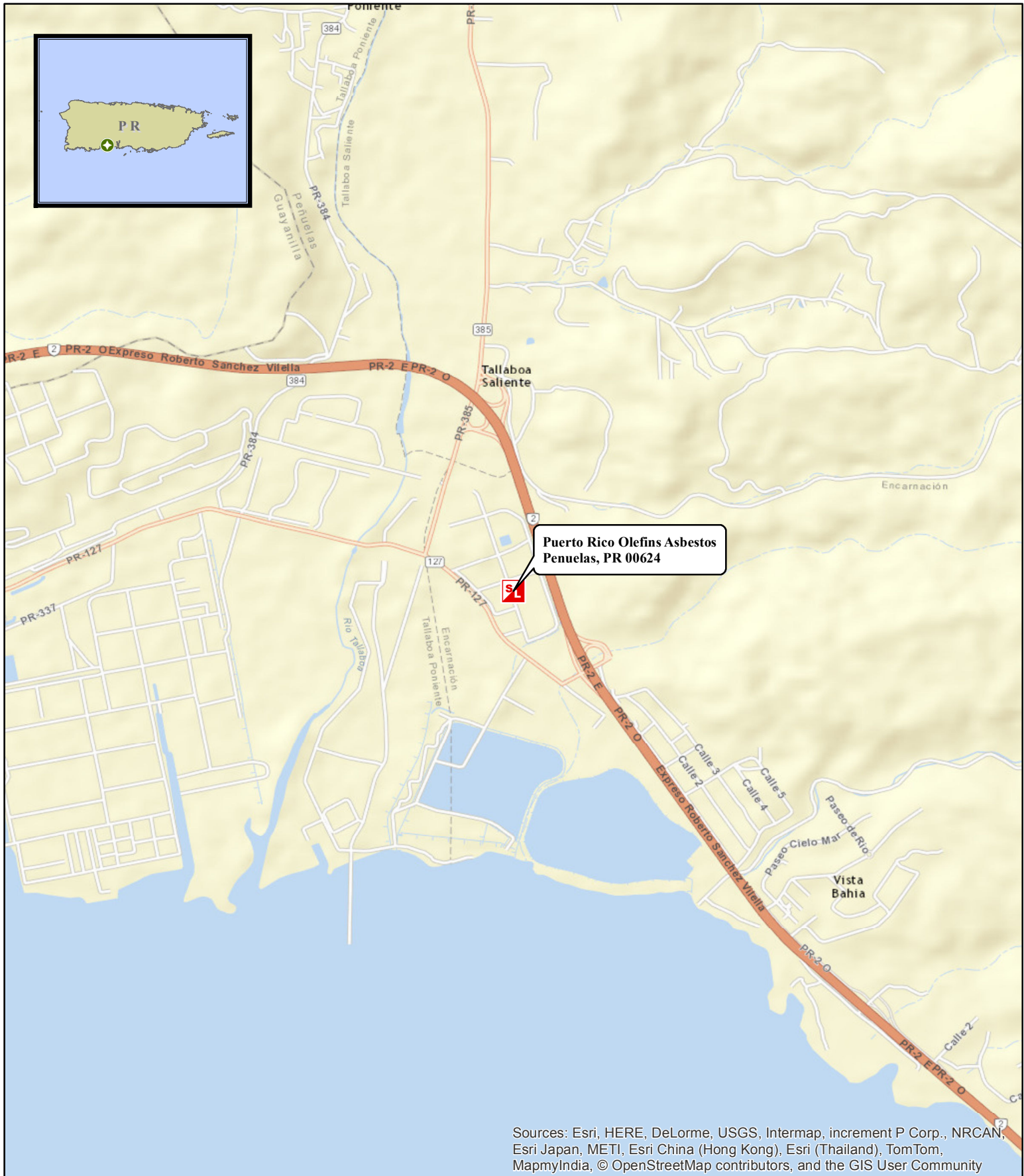
Report reviewed by: 

Date: 11/3/14

Timothy Benton
RST 3 Operations Manager


ATTACHMENT A

Figure 1: Site Location Map
Figure 2: Sample Location Map




Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Legend

 Site Location

0 0.05 0.1 0.2 0.3 0.4 Miles



**Weston Solutions, Inc.**
East Division

In association with
Scientific and Environmental Associates, Inc.,
Avatar Environmental, LLC, Environmental Compliance Consultants,
On-Site Environmental, Inc., and Sovereign Consulting, Inc.

Figure 1 Site Location Map	
Puerto Rico Olefins Asbestos Penuelas, Puerto Rico	
U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL SUPPORT TEAM 3 CONTRACT # EP-S2-14-01	
GIS ANALYST:	T. BENTON
EPA OSC:	A. RODRIGUEZ
RST SPM:	C. HUERTAS
FILENAME:	SITEMAP.MXD



PR

SCALE
1:4,213

LEGEND

- Phase I Soil Sample Location
- Phase I Wipe Sample Location
- Phase I Bulk Sample Location
- Phase I Multi-Media Sample Location
- Site Boundary

Note: Wipe sample W-004-001 was collected from a crane that has since been removed from the Site.

Figure 2
Sample Location Map

Puerto Rico Olefins Asbestos Site
Penuelas, Puerto Rico

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REMOVAL SUPPORT TEAM 3
CONTRACT # EP-S2-14-01

Weston Solutions, Inc.

In association with Scientific and Environmental Associates, Inc., Avatar Environmental, LLC, Environmental Compliance Consultants, On-Site Environmental, Inc., and Sovereign Consulting, Inc.

GIS ANALYST:	T. BENTON
EPA OSC:	A. RODRIGUEZ
RST 2 SPM:	C. HUERTAS
FILENAME:	Sample Location Map
FIGURE	2
REVISION	2
DATE MODIFIED	11/3/2014

ATTACHMENT B

Table 1: Sample Collection Information Table

Table 2: Validated Analytical Data Summary – Asbestos Bulk Samples

Table 3: Validated Analytical Data Summary – Asbestos Soil Samples

Table 4: Validated Analytical Data Summary – Asbestos Wipe Samples

Table 1: Sample Collection Information Table
 Puerto Rico Olefins Asbestos Site
 Peñuelas, Puerto Rico
 November 21, 2013 and December 13, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type
ACM-001-001	PS 408	11/21/2013	13:18	Bulk	Grab	Asbestos	Field Sample
ACM-001-002	PS 408	11/21/2013	13:21	Bulk	Grab	Asbestos	Field Duplicate
ACM-002-001	PS 410	11/21/2013	13:23	Bulk	Grab	Asbestos	Field Sample
ACM-003-001	Front Flare	11/21/2013	13:30	Bulk	Grab	Asbestos	Field Sample
ACM-004-001	OV 409	11/21/2013	13:44	Bulk	Grab	Asbestos	Field Sample
P0001-ACM005-01	Chimneys East Property	12/13/2013	10:24	Bulk	Grab	Asbestos	Field Sample
P0001-ACM006-01	Metal Pile	12/13/2013	10:34	Bulk	Grab	Asbestos	Field Sample
S0001-0006-001	Front Flare	11/21/2013	13:31	Soil	Grab	Asbestos	Field Sample
S0002-0006-001	Next to Shed	11/21/2013	13:37	Soil	Grab	Asbestos	Field Sample
S0002-0006-002	Next to Shed	11/21/2013	13:39	Soil	Grab	Asbestos	Field Duplicate
S0003-0006-001	Main Entrance	11/21/2013	14:01	Soil	Grab	Asbestos	Field Sample
W-001-001	Front Flare	11/21/2013	13:33	Wipe	Grab	Asbestos	Field Sample
W-002-001	PS 402	11/21/2013	13:47	Wipe	Grab	Asbestos	Field Sample
W-003-001	Scrap Metal Front Crane	11/21/2013	13:50	Wipe	Grab	Asbestos	Field Sample
W-004-001	Crane- Driver Side Front Floor	11/21/2013	13:53	Wipe	Grab	Asbestos	Field Sample
W-005-001	Vertical Concrete	11/21/2013	13:39	Wipe	Grab	Asbestos	Field Sample
W-006-001	Metal Fence Highway	11/21/2013	14:35	Wipe	Grab	Asbestos	Field Sample
W-007-001	Residential House	11/21/2013	14:45	Wipe	Grab	Asbestos	Field Sample
W-008-001	Restaurant- El Velorio	11/21/2013	14:54	Wipe	Grab	Asbestos	Field Sample
W-009-001	Science Classroom	11/21/2013	15:15	Wipe	Grab	Asbestos	Field Sample
W-Blank-001	Blank	11/21/2013	13:00	Wipe	Grab	Asbestos	Wipe Blank

Table 2: Validated Analytical Data Summary - Asbestos Bulk Samples
 Puerto Rico Olefins Asbestos Site
 Peñuelas, Puerto Rico
 November 21, 2013 and December 13, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Asbestos % Type	
								Amosite	Chrysotile
ACM-001-001	PS 408	11/21/2013	13:18	Bulk	Grab	Asbestos	Field Sample	35	5
ACM-001-002	PS 408	11/21/2013	13:21	Bulk	Grab	Asbestos	Field Duplicate	30	6
ACM-002-001	PS 410	11/21/2013	13:23	Bulk	Grab	Asbestos	Field Sample	None Detected	None Detected
ACM-003-001	Front Flare	11/21/2013	13:30	Bulk	Grab	Asbestos	Field Sample	40	2
ACM-004-001	OV 409	11/21/2013	13:44	Bulk	Grab	Asbestos	Field Sample	2	20
P0001-ACM005-01	Chimneys East Property	12/13/2013	10:24	Bulk	Grab	Asbestos	Field Sample	None Detected	None Detected
P0001-ACM005-01	Metal Pile	12/13/2013	10:34	Bulk	Grab	Asbestos	Field Sample	None Detected	None Detected

Table 3: Validated Analytical Data Summary - Asbestos Soil Samples
 Puerto Rico Olefins Asbestos Site
 Peñuelas, Puerto Rico
 November 21, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Mineral Type(s)	# of Structures Detected	Analytical Sensitivity %	Asbestos Weight %
S0001-0006-001	Front Flare	11/21/2013	13:31	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	3	0.1	0.1
S0002-0006-001	Next to Shed	11/21/2013	13:37	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	9	0.1	0.6
S0002-0006-002	Next to Shed	11/21/2013	13:39	Soil	Grab	Asbestos	Field Duplicate	Amosite	3	0.1	< 0.1
S0003-0006-001	Main Entrance	11/21/2013	14:01	Soil	Grab	Asbestos	Field Sample	Amosite Chrysotile	6	0.1	< 0.1

Table 4: Validated Analytical Data Summary - Asbestos Wipe Samples
 Puerto Rico Olefins Asbestos Site
 Peñuelas, Puerto Rico
 November 21, 2013

Sample #	Sample Location	Sample Date	Sample Time	Matrix	Collection	Analysis	Sample Type	Asbestos Type	Asbestos Structures	Sensitivity *	Concentration (str/cm ²)
W-001-001	Front Flare	11/21/2013	13:33	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	21	4,850	102,000
W-002-001	PS 402	11/21/2013	13:47	Wipe	Grab	Asbestos	Field Sample	Chrysotile	4	1,940	7,760
W-003-001	Scrap Metal Front Crane	11/21/2013	13:50	Wipe	Grab	Asbestos	Field Sample	Chrysotile	26	9,710	252,000
W-004-001	Crane- Driver Side Front Floor	11/21/2013	13:53	Wipe	Grab	Asbestos	Field Sample	Chrysotile	5	24,200	121,000
W-005-001	Vertical Concrete	11/21/2013	13:39	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	41	1,940	79,500
W-006-001	Metal fence Highway	11/21/2013	14:35	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	8	1,940	15,500
W-007-001	Residential House	11/21/2013	14:45	Wipe	Grab	Asbestos	Field Sample	Chrysotile	4	4,850	19,400
W-008-001	Restaurant- El Velorio	11/21/2013	14:54	Wipe	Grab	Asbestos	Field Sample	Amosite Chrysotile	77	4,860	374,000
W-009-001	Science Classroom	11/21/2013	15:15	Wipe	Grab	Asbestos	Field Sample	Chrysotile	16	1,940	31,000
W-Blank-001	Wipe Blank	11/21/2013	13:00	Wipe	Grab	Asbestos	Wipe Blank	None	< 2.99	Non Detected	Non Detected

* Due to excessive particulate the analytical sensitivity of 260 str/cm² as required by the method was not reached.

ATTACHMENT C

Chain of Custody Records and FedEx Airbills

USEPA

Date Shipped: 11/22/2013

RFP# 272

PO# 0084459

CHAIN OF CUSTODY RECORD

Site #: 0029 - 0122

Contact Name: Smita Sumbaly

Contact Phone: 732-585-4400

No: 00290122-112213-001

Cooler #: 001

Lab: EMSL

Lab Phone: 800-220-3675

Lab #	Sample #	Location	Analyses	Matrix	Collected	Numb Cont	Container	Preservative	MS/MSD
	ACM-001-001	PS 408	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-001-002	PS 408	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-002-001	PS 410	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-003-001	Front Flare	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	ACM-004-001	OV 409	Asbestos	Insulation	11/21/2013	1	Plastic bag		N
	S0001-0006-001	Front Flare	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	S0002-0006-001	Next to shed	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	S0002-0006-002	Next to shed	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	S0003-0006-001	Main entrance	Asbestos	Soil	11/21/2013	1	4 Oz glass jar		N
	W-001-001	Front Flare	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-002-001	PS 402	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-003-001	Front Crane	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-004-001	Crane	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-005-001	Vertical concrete	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-006-001	Metal fence highway	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-007-001	Residential House	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-008-001	Restaurant	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-009-001	Science classroom	Asbestos	Wipe	11/21/2013	1	Plastic Bag		N
	W-Blank-001	Blank	Asbestos	Wipw	11/21/2013	1	Plastic Bag		N

SAMPLES TRANSFERRED FROM

CHAIN OF CUSTODY

Special Instructions: 24 hrs Turn Around Time

Items/Reason	Relinquished by	Date	Received by	Date	Time	Relinquished By	Date	Received by	Date	Time
All items for	Carlos Hunk	11/22/13	Corey	11/24/13	10:45					

5 bak
4 sov
16 wipe

OK



1 From Please print your name last	
Date	11/25/13
Sender's FedEx Account Number	
Sender's Name	Carlos Huertas
Phone	787-354-2489
Company	Weston Solutions
Address	700 Calle Europa Esquina
Address	Fernandez Juncos Suite 206
City	San Juan
State/Province	Puerto Rico
Country	PSA
ZIP Postal Code	00910

2 To

Recipient's Name Scott Ross Phone 856-303-2538

Company EMSL Analytical

Address 200 Route 130 North

Dept./Floor _____

Address _____

City Cinnaminson State New Jersey

Country USA ZIP Postal Code 08077

Recipient's Tax ID Number for Customs Purposes
e.g. GST/HST/VAT/IEV/VAT, or none listed.

3 Shipment Information

Total Packages 1 Total Weight 7 ☐ kg ☒ lb B, B, B in 3 cm

Commodity Description DETAIL REQUIRED	Harmonized Code	Country of Manufacture	Value for Customs REQUIRED
Example: 3-man's knitted sweater, 100 percent cotton.			
FOLD HERE BEFORE INSERTING IN POUCH.			
Environmenta COMPLET IN ENGLAND Samples (soil, Bulk, wipe) UN 2540 White Asbestos Net Qty 15.0kg			
<input type="checkbox"/> Has REVENUE form filed to AES? <i>For U.S. Export Only: Check One</i>	<input checked="" type="checkbox"/> For EU Only: Tick here if goods are not in free circulation and provide C.E.	Total Declared Value for Carriage	
<input type="checkbox"/> No REVENUE required, value \$2500 or less per Schedule B Number, no license required (BULPL not subject to HAR).	<input type="checkbox"/> other than NLR, enter License Exception:		
<input type="checkbox"/> No REVENUE required, enter exemption number:			
<input type="checkbox"/> Yes - Enter AES proof of filing citation:			

For Completion Instructions, see back of fifth page.

Questions?
Go to our Web site at fedex.com.
or
In the U.S., call 1.800.247.4747.
Outside the U.S., call your local FedEx office.

The World On Time.

Not all services and options are available to all destinations.

4a **Express Package Service** Packages up to 138 lbs./68 kg

☒ **FedEx Int. Priority** ☐ **FedEx Int. First** ☐ **FedEx Int. Economy**
Available to select locations. Higher rates apply. FedEx Envelope and FedEx Pak rate not available.

4b **Express Freight Service** Packages over 150 lbs./68 kg☐ FedEx Intl. Priority Freight ☐ FedEx Intl. Economy Freight

Booking Number **REQUIRE**
Please call your local FedEx office to book shipments

5 Packaging

☐ FedEx Envelope ☒ FedEx Pak ☐ FedEx Box ☐ FedEx Tube
☒ Other Post Box ☐ FedEx 10kg Box* ☐ FedEx 25kg Box*

6a **Special Handling**

☐ **HOLD at FedEx Location** ☐ **SATURDAY Delivery**
Available to select locations for FedEx Next Business DaySM and FedEx FirstSM Priority Freight only.

Does this shipment contain dangerous goods?
(One box must be placed here if checked.)

☐ No ☐ Yes ☒ Yes
As per attached Shipper's Declaration not required.

☐ **Dry Ice**
Dry Ice 3.4N 1055 _____ kg

☐ **Cargo Aircraft Only**

Dangerous goods (including dry ice) cannot be shipped in FedEx FirstSM Priority.

6b Broker Selection
Not available with FedEx Fast, First.

☐ **Intl. Broker Select**
To specify a broker other than FedEx.

Broker's Name _____

City/State/Province/Country _____

Zip/Postal Code _____ **REQUIRED** Phone _____

7a Payment Bill transportation charges to:

☐ Sender Acct No. in Section 1 will be billed.
 ☐ Recipient
 ☒ Third Party
 ☐ Credit Card
 ☐ Cash Check/ Cheque

FedEx Acct No. 402356103
 FedEx Use Only

Credit Card No.

Call Center Data

7b Payment Bill duties and taxes to: ALL shipments may be subject to Customs charges which FedEx does not estimate prior to clearance.

☐ Sender: Acct. No. in Section 1 will be billed. ☐ Recipient ☒ Third Party

FedEx Acct. No. 402356103

8 **Your Internal Billing Reference** First 28 characters will appear on invoice
10-0029-0727

9 Required Signature _____

Use of this Air Waybill constitutes your agreement to the Conditions of Contract on the back of this Air Waybill, and you represent that this shipment does not violate U.S. State Department Economic and Trade Administration regulations, including the Wassenaar Arrangement, may apply to this shipment and limit our liability for damage, loss, or delay, as described in the Conditions of Contract.

WARRANTY: These commodities, technology, or software were exported from the United States in accordance with Export Administration regulations. Diversion contrary to U.S. law is prohibited.

Sender's Signature: _____
This is not authorization to deliver this document without a personal signature.

FedEx
Courier Receipt

Date: _____

For better service, please write clearly.

 Ship and track packages at fedex.com

FedEx
Tracking
Number 8713 7779 0608 Form
ID No. 0425

27. P.



Expanded Service International Air Waybill

For FedEx services worldwide including express freight services, dangerous goods, broker select, and letter of credit.

1 From Please print and press hard.

Date 12/16/13 Sender's FedEx Account Number 555111 1111 1111 1111
Sender's Name Carlos L Hunter Phone 87-354-2489
Company Weston Solutions
Address 700 Calle Europa Esquina
Address Fernandez Puentes Suite 201
City San Juan State Puerto Rico
Country USA ZIP Postal Code 00910

2 To

Recipient's Name Sample Receiving Phone 856-303-2538
Company EMSL Analytical
Address 200 route 130 North
Address
City Cinnaminson State New Jersey
Country USA ZIP Postal Code 08077

Recipient's Tax ID Number for Customs Purposes
e.g. GST#RUC/VAT#IN/EIN/ABN, as locally required.

3 Shipment Information

Total Packages 1 Total Weight 3 13.13 lbs. 13.13 kg DIM 13.13 cm
Shipper's Load and Count/SLAC

Commodity Description	Harmonized Code	Country of Manufacture	Value for Customs
UN 2590 White Asbestos (Bulk) Class 9 4kg		USA	

Has ESI been filed in AES? ☒ Yes - Enter ESI number: 13131313
☐ No ESI required, enter exemption number: 13131313
☐ Yes - Enter AES proof of filing citation: 13131313

Total Declared Value for Carriage: 13.13
Total Value for Customs (Specify Currency): 13.13

For Completion Instructions, see back of fifth page.

Questions?
Go to our Web site at fedex.com.

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ATTACHMENT D

Photographic Documentation Log, Revision 1

Photographic Documentation Log, Revision 1
Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013



Photo 1: Samples ACM-001-001 and ACM-001-002 being collected from the Site on November 21, 2013.



Photo 2: Samples ACM-001-001 and ACM-001-002 being collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013



Photo 3: Sample ACM-002-001 being collected from the Site on November 21, 2013.



Photo 4: Close up of Sample Location ACM-002-001 which was collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013



Photo 5: Samples ACM-003-001, S0001-0006-001 and W-001-001 being collected from the Site on November 21, 2013.



Photo 6: Samples ACM-003-001, S0001-0006-001 and W-001-001 being collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
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Photo 7: Samples locations S0002-0006-001 and S0002-0006-002 which were collected from the Site on November 21, 2013.



Photo 8: Samples S0002-0006-001 and S0002-0006-002 being collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013



Photo 9: Samples location ACM-004-001 which were collected from the Site on November 21, 2013.



Photo 10: Sample W-002-001 being collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013



Photo 11: Sample W-002-001 being collected from the Site on November 21, 2013.



Photo 12: Sample Location W-003-001 which was collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
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November 21, 2013 and December 13, 2013



Photo 13: Sample W-003-001 being collected from the Site on November 21, 2013.



Photo 14: Sample Location W-004-001 which was collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013



Photo 15: Sample Location W-004-001 which was collected from the Site on November 21, 2013.



Photo 16: Sample Location W-005-001 which was collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
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Photo 17: Sample W-005-001 being collected from the Site on November 21, 2013.



Photo 18: Sample Location S0003-0006-001 which was collected from the Site on November 21, 2013.

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Photo 19: Sample S0003-0006-001 being collected from the Site on November 21, 2013.



Photo 20: Sample W-006-001 being collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
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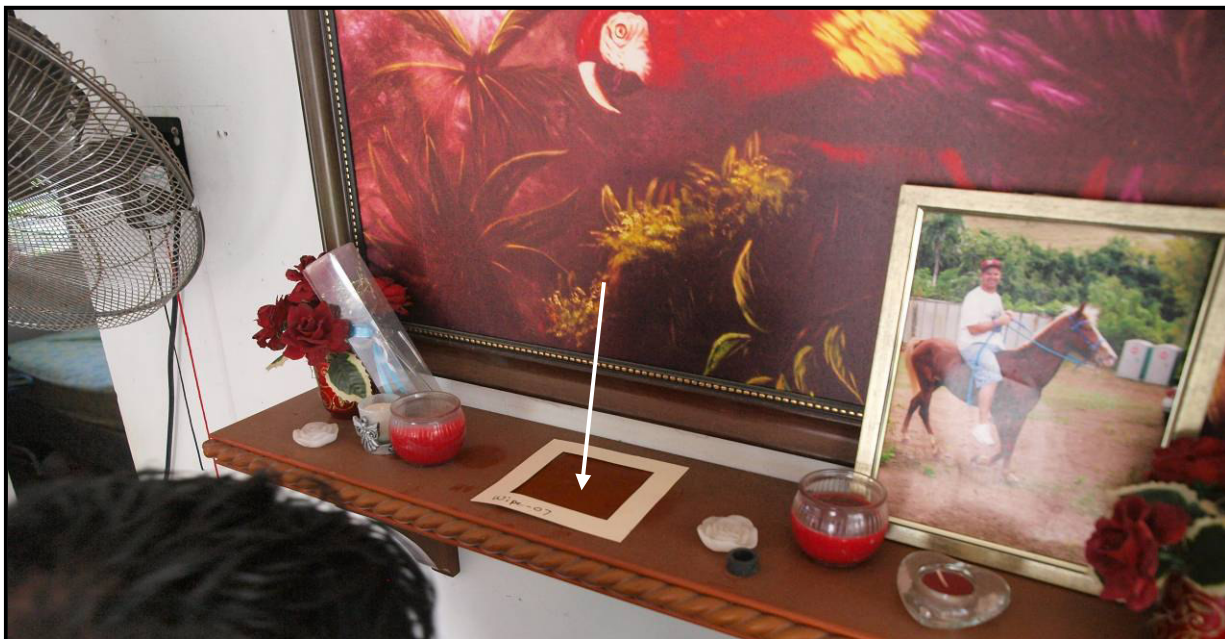


Photo 21: Sample Location W-007-001 which was collected from the Site on November 21, 2013.



Photo 22: Sample W-008-001 being collected from the Site on November 21, 2013.

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Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
November 21, 2013 and December 13, 2013

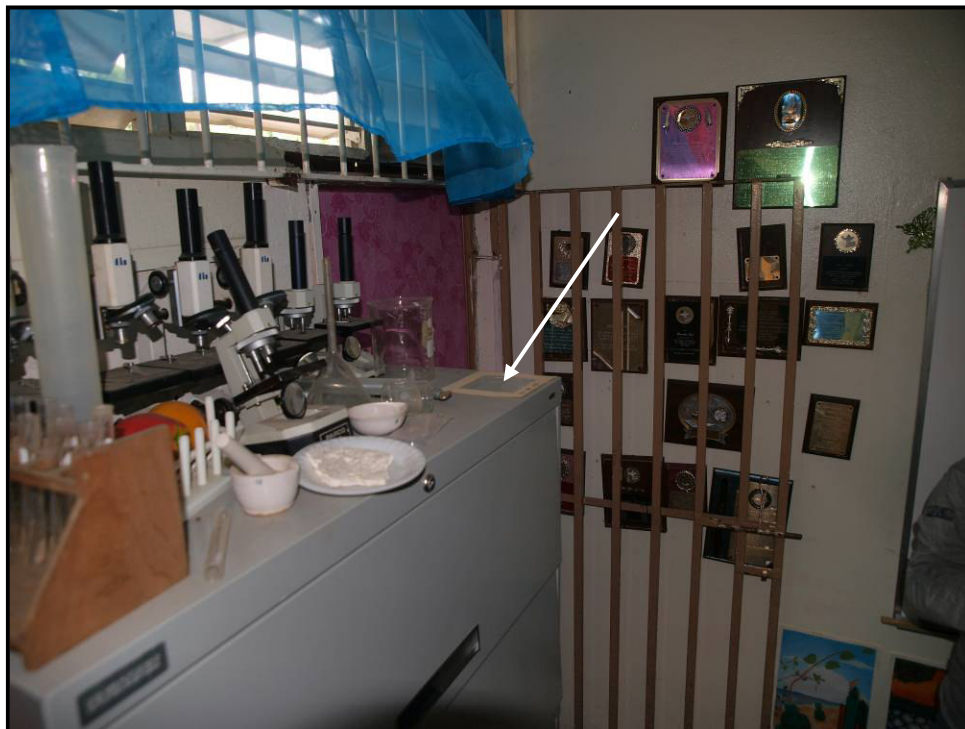


Photo 23: Sample Location W-009-001 which was collected from the Site on November 21, 2013.



Photo 24: Sample P0001-ACM005-01 being collected from the Site on December 13, 2013.

Photographic Documentation Log, Revision 1
Puerto Rico Olefins Asbestos Site
Peñuelas, Puerto Rico
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Photo 25: Sample Location P0001-ACM006-01 which was collected from the Site on December 13, 2013.